

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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**Hearing Date and Time**  
**October 9, 2012 at 10:00 am**

**In Re:**

**B & M Linen Corp.,**

**Debtor.**

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**DEBTOR'S JOINDER TO OBJECTION OF MIRON MARCUS, BORIS MARCUS AND 220 COSTER LLC TO MOTIONS TO CONVERT**

B&M Linen Corp, the debtor and debtor in possession (the "Debtor"), by its counsel Shafferman & Feldman LLP, as and for its Joinder in Support of the Objection (the "Objection") of Miron Markus and Boris Markus, in their individual capacity, and 220 Coster LLC (collectively, "Marcus/Coster"), to (a) the Motion of the United States Trustee for (i) the Conversion of this Chapter 11 Case to a Case under Chapter 7, or, in the Alternative, (ii) the Appointment of a Chapter 11 Motion of District 37, Local 2021 for Appointment of Trustee pursuant to section 926(a) of title 11 of the United States Code (the "Motions"), respectfully represents as follows:

1. As set forth in the Objection, Marcus/Coster have committed themselves to using the insurance proceeds from insurance policies under which the Debtor and 220 Coster LLC, the Debtor's landlord, are named insureds to fund a plan of reorganization which will pay creditors one hundred percent of their allowed claims in this case. The contemplated plan will also include a mechanism to enable the Debtor to liquidate disputed claims and pay the allowed amount of such claims in full. Finally, the plan will enable the Debtor to resume its operations and emerge from this Chapter 11 case after the unfortunate events of this past summer.

2. Based upon the ongoing joint efforts between Marcus/Coster, the Debtor and their respective counsel, it is respectfully requested that the Motions should be denied, without prejudice, or adjourned to a later date.

**DATED:** New York, New York  
October 8, 2012

**SHAFFERMAN & FELDMAN, LLP**  
**Attorneys for the Debtor**  
286 Madison Avenue, Suite 502  
New York, New York 10017  
(212) 509-1802

By: /S/ Joel M. Shafferman  
**Joel M. Shafferman (JMS-1055)**